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April 4, 2017

Honorable Cathy L. Waldor, U.S. District Judge
United States District Court-District of NJ
M.L. King Jr. Federal Building
50 Walnut Street, Room 4040
Newark, NJ 07102

Re: Jeffrey Michne, et al. v. Prestige of Ramsey, Inc., et al
Docket #: 2:16-cv-01393-SRC-CLW

Dear Judge Waldor:

The attorneys for the respective parties in the above-captioned case met in person at Mr. Piasecki's office, at Your Honor's suggestion, to craft a reasonable discovery schedule. We respectfully submit the following proposal, with the dates to run beginning on the date of the Court's order.

Written discovery, including interrogatories and defendant's acquisition of medical records - 90 days.

Depositions of fact witnesses - 60 days following completion of written discovery. (It is anticipated that plaintiff's deposition will take place over several days, due to his physical limitations.)

Plaintiff's expert reports - 90 days following completion of depositions.

Defendants expert reports - 90 days following plaintiff's production of expert reports.

Deposition of experts - 60 days following defendants production of their expert reports.

Mr. Piasecki and Mr. Colitti have given me their authority to advise Your Honor that this schedule is acceptable to them. We respectfully request the court to accept this discovery schedule.

Respectfully submitted,

STARK & STARK
A Professional Corporation

By: s/s JOHN A. SAKSON

JAS/mai
Cc: Christopher Piasecki, Esquire
Mario Colitti, Esquire